

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

GEORGE HENGLE, *et al.*, on behalf of  
themselves and all others similarly  
situated,

Plaintiffs,

v.

Case No: 3:19-cv-250-DJN

SCOTT ASNER, *et al.*,

Defendants.

**PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT**

Plaintiffs George Hengle, Sherry Blackburn, Willie Rose, Elwood Bumbray, Tiffani Myers, Steven Pike, Sue Collins, Lawrence Mwethuku, Regina Nolte, and Jo Ann Falash,<sup>1</sup> by Class Counsel, move the Court for preliminary approval of the Stipulation and Agreement of Settlement, attached as Exhibit 1, under Federal Rule of Civil Procedure 23(b)(3). They also move the Court for certification of the Settlement Class, appointment of Class Counsel and Class Representatives, approval of the proposed class notices and notice plans, appointment of the settlement administrator, and scheduling of a final fairness hearing. A proposed Preliminary Approval Order is attached as Exhibit 2, and the support for this request is set forth in the concurrently-filed memorandum of law. Defendants do not oppose the filing of this motion.

Respectfully submitted,  
**PLAINTIFFS**

/s/ Kristi C. Kelly  
Kristi Cahoon Kelly, VSB #72791  
Andrew J. Guzzo, VSB #82170

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<sup>1</sup> The proposed settlement includes two plaintiffs and two defendants that are not currently parties to the litigation. The Plaintiffs have sought leave to file an amended complaint to add these parties to the litigation. (ECF No. 183.)

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